

# **Exhibit Y1**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

<b>EASTERN PROFIT CORPORATION</b>	)	
<b>LIMITED,</b>	)	
	)	
<b>Plaintiff/Counterclaim Defendant,</b>	)	
	)	<b>Case No. 18-cv-2185 (JGK)</b>
<b>v.</b>	)	
	)	
<b>STRATEGIC VISION US, LLC,</b>	)	
	)	
<b>Defendant/Counterclaim Plaintiff.</b>	)	
	)	

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**NOTICE OF DEPOSITION**

PLEASE TAKE NOTICE that the deposition of Plaintiff/Counterclaim Defendant Eastern Profit Corporation Limited (“Eastern Profit” or “Eastern”), pursuant to Fed. R. Civ. P. 30(b)(6) and through one or more officers, directors, or other representatives who shall be designated to testify on Eastern Profit's behalf regarding all information known or reasonably available to Eastern Profit with respect to the subject matters identified in Attachment A, will be taken by Graves Garrett LLC, counsel for Defendant/Counterclaim Plaintiff, at the offices of Pepper Hamilton LLP, 620 Eighth Avenue, 37<sup>th</sup> Floor, New York, New York, on Wednesday, October 30, 2019, commencing at 9:00 a.m. and continuing until completed, before a person authorized by law to administer oaths and recorded by video and stenographic means. The court reporter and videographer will be supplied by Atkinson-Baker court reporters.

Dated October 28, 2019

Respectfully submitted,

GRAVES GARRETT LLC

s/ Edward D. Greim

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ATTORNEYS FOR

DEFENDANT/COUNTERCLAIM PLAINTIFF

**CERTIFICATE OF SERVICE**

I hereby certify that on October 28, 2019, the foregoing was emailed to the following parties:

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s/ Edward D. Greim

Attorney for Defendant/Counterclaim  
Plaintiff

EXHIBIT A

In accordance with Fed. R. Civ. P. 30(b)(6), Strategic Vision designates the matters identified below for examination. In construing these topics, the following instructions and definitions shall apply:

A. All terms shall be construed to encompass as broad a range of information as permitted under the Federal Rules of Civil Procedure.

The deponent(s) shall be prepared to address the following topics:

1. The Research Agreement signed on or about January 6, 2018 between Eastern and Strategic Vision (the "Agreement"), including negotiations concerning same.
2. The corporate structure of Eastern, including its principals and affiliation with counterclaim defendant Guo Wengui ("Mr. Guo").
3. The corporate structure of ACA Capital Group Limited, including its principals and affiliation with Eastern and/or Mr. Guo.
4. Eastern's performance under the Agreement, including (i) all information provided by Eastern to Strategic Vision; and (ii) Eastern's adherence to Strategic Vision's directives.
5. Strategic Vision's performance under the Agreement.
6. Eastern's termination of the Agreement.
7. The \$1 million payment to Strategic Vision pursuant to the Agreement.